Planning Policy Team

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FAO the Planning Policy Team,

**RE: Nottingham City and Nottinghamshire Joint Waste Local Plan (draft)**

Thank you for consulting Mansfield District Council on the above document which when adopted will provide the planning policy framework against which all proposals for new waste development will be assessed. The council has the following comments:

*Vision and strategic objectives:* The council supports the plan’s vision which seeks to ensure less waste is produced by re-using resources in a circular economy with disposal being the last resort. Ensuring there is capacity over the plan period within appropriately located waste management facilities is important and the council supports the approach to locate larger facilities towards Mansfield (as well as Nottingham and Ashfield) as the largest town in the county. This will ensure waste is processed close to where it is produced and keep transportation to a minimum, as well as providing local jobs.

The council is encouraged to see the emphasis on protecting and enhancing the environment and adapting to climate change within the vision and strategic objectives.

*Strategic Policy 1 – Waste prevention and re-use:* The council supports this policy which ensures that the waste hierarchy is considered in all development proposals and would be read alongside Policy P5 of the adopted Mansfield District Local Plan 2013-33.

*Strategic Policy 3 – Broad locations for new waste treatment facilities:* This policy identifies the Mansfield/Ashfield area as being suitable for all scales of waste treatment facilities. It also supports the development of facilities within the open countryside and within the Green Belt if justified by a clear need (such as a wastewater treatment works) and particularly where enhanced job opportunities are provided and / or existing buildings can be reused. The council supports this policy and agrees that the Mansfield/Ashfield area is an appropriate broad location due to the size and close proximity of the towns of Mansfield, Kirkby-in-Ashfield and Sutton-in-Ashfield. As mentioned above there are sustainability benefits of treating waste close to where is it is produced as this keeps transportation to a minimum. There are also likely to be economic benefits if local job opportunities are available.

Please note that the plan reference is missing in paragraph 7.21, as well as the plan it refers to.

*Strategic Policy 4 – Residual waste management:* The draft waste local plan explains that there is likely to be a need for further landfill capacity from 2024 onwards. However it is understood that the scope to provide capacity in the plan area is extremely unlikely due to the geology of the area, and that residual waste (remaining waste that cannot be reused) may need to be transported to the nearest available site outside of the plan area.

Despite this, Policy SP4 would be used to control any new development proposals seeking to dispose of residual waste that come forward. This includes the recovery of inert waste used for restoration of mineral workings, landfill, and landraise sites, as well as the disposal of non-hazardous and hazardous waste to landfill. Part c of the policy states that in all cases, the resulting final landform, landscaping and after-uses must be designed to take account of and, **where appropriate**, enhance the surrounding landscape, topography and natural environment. It is questioned why the phrase “where appropriate” is required rather than the policy seeking enhancements in all cases. This seems to contradict paragraph 8.57 which later on in the document states how waste facilities, particularly disposal sites which require restoration, can enhance biodiversity and should be restored to high environmental standards. Paragraph 8.58 goes on to say that such opportunities should be maximised and biodiversity net gains achieved where possible.

*Strategic Policy 5 – Climate Change:* This policy seeks to minimise the impacts of waste related development on climate change and is supported by the council. This includes extensions to existing facilities, as well as any new facilities.

*Strategic Policy 8 – Safeguarding waste management sites:* This policy safeguards existing waste management facilities, potential extensions, sites with unimplemented planning permission and facilities to transport waste, from loss. It also ensures that any non-waste uses proposed nearby provide adequate mitigation and do not negatively affect the operation of the facility. This would safeguard sites located within Mansfield district and is supported by the council.

Please note that paragraphs 7.62 and 7.64 refers to the policy as SP7 rather than SP8.

The suite of draft development management policies in section 8 of the draft plan are supported. Please note the following minor comments on this section:

* Paragraph 8.35 refers to Policy DM2: Design and landscaping, but the title in the draft plan is Health, wellbeing and amenity.
* Paragraph 8.37 refers to the Landscape Character Assessments (LCAs) published in 2009 which cover the whole plan area. Mansfield has an updated LCA addendum (published in 2015) which should be referred to. It is available at: <https://www.mansfield.gov.uk/heritage-conservation-trees-hedges/landscape-character-assessment-1>
* Paragraph 8.80 includes an incomplete last sentence.
* Paragraph 8.93 refers to Table X rather than Table 13.

As a general note, some of the boxes which contain the findings from the sustainability appraisal at issues and options stage do not match up with the correct draft policies. In addition, there are some references to the 2019 version of the NPPF rather than 2021.

We have also consulted our Waste and Recycling Manager who had the following comments to make from a waste operations perspective:

**Waste Storage**

* From an operational point of view, it is important that any developments have adequate storage provision and this is something that we have had issues with in the past. There needs to be enough storage space to enable residents to participate in all recycling services.
* If the waste hierarchy is to be considered when plans are being drawn up, there should be encouragement for communal properties to have an area to present / store bulky waste items (i.e. furniture) for collection by a charity or social enterprise.
* Whilst the details from the Environment Bill regarding waste management and the consistency of household recycling collections have yet to be confirmed, it is anticipated that there will be food waste collections for householders and businesses and this will inevitably require additional storage.

**Waste Collection Points**

* There seems to be a general move towards private drives and shared access on a lot of new residential developments which can cause issues on collection days as the resident does not want the 26 tonne vehicle driving on their private drive but they also do not want ‘X’ number of bins at a collection point at the entrance to the development.

**Waste Collection Vehicles**

* The switch to electric vehicles will only gather more pace over the next 16 years (including refuse vehicles) so it would be good to see some reference to charging facilities at waste facilities or some recognition that there will be a reduction in noise and an improvement in local air quality. The number one strategic objective is to act on climate change and as the way we transport and collect waste will change with electric vehicles becoming more common, there should be a steer towards developing this in any new infrastructure.

Thank you for the opportunity to comment on the draft Joint Waste Local Plan. We trust that the above is helpful in the development of the document.

Yours sincerely,



Tracey Tucker

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Mansfield District Council